



CELA

## **SENSITIVE**



**MEMORANDUM** 

TO:

The Commission

FROM:

**Anthony Herman** 

General Counsel

Daniel A. Petalas

Associate General Counsel for Enforcement

FEDERAL ELECTION COMMISSION

Washington, DC 20463

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Kathleen M. Guith

Deputy Associate General Counsel for Enforcement

BY:

Peter G. Blumberg

Assistant General Counsel

Thomas J. Andersen

Attorney

**SUBJECT:** 

MUR 6463 (John "Jack" Joseph Antaramian, et al.)

Pre-Probable Cause Conciliation

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Attached is a proposed conciliation agreement that has been signed by counsel for John "Jack" Joseph Antaramian and the Antaramian Development Corporation of Naples, which would settle violations of 2 U.S.C. §§ 441b(a), 441a(a)(1)(B) and 441a(a)(3)(B).

We recommend

that the Commission accept the attached signed conciliation agreement.

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## **RECOMMENDATIONS:**

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1. Accept the attached conciliation agreement as to John "Jack" Joseph Antaramian and the Antaramian Development Corporation of Naples.

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2. Approve the appropriate letter.

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